

1 A (Witness Weeks) IV-D-10?

2 Q IV-D-10. These tests also measure timeliness of
3 response to pre-order inquiries, do they not?

4 A (Witness Weeks) That's correct.

5 Q And these were volume tests that you did at
6 "normal volume," is that correct?

7 A (Witness Weeks) Yes, that's correct.

8 Q On these tests, did you do the same thing, did you
9 use both the time for the queries that didn't go into
10 BellSouth's systems and the time for the queries that went
11 all the way into BellSouth's systems and came back out?

12 A (Witness Weeks) We believe the correct answer to
13 the question is there were a very small number of planned
14 errors and to our recollection no unplanned errors when we
15 executed the volume test, and we believe that the averages
16 that are shown include those planned errors, of which there
17 were a very small number.

18 Q So they do include the TAG API responses that you
19 got.

20 A (Witness Weeks) Yes.

21 Q Okay. But those aren't reported here like they
22 were reported back in the pre-one test, is that correct?

23 A (Witness Weeks) They're not broken out separately
24 so that you can see them.

25 Q Okay. So looking at this section, we can't see

1 the way we went through and analyzed how the TAG API
2 responses might have influenced the final numbers -- we can
3 see that in these tests, can we?

4 A (Witness Weeks) No, because they were such a
5 small number by comparison to the whole, they wouldn't have
6 changed the over all numbers.

7 Q But the number of them isn't listed in the report,
8 is it?

9 A (Witness Weeks) That is correct.

10 Q I'd like to talk about some ordering and
11 provisioning retests -- tests and retests. I'd like to go
12 to O&P-1-3-1 through 1-3-6. They begin on page V-A-11.

13 A (Witness Weeks) O&P-1-3-1 through 1-3-6?

14 Q Yes.

15 A (Witness Weeks) Okay.

16 Q O&P test 1-3-2 was a test for timely return of
17 order errors, is that correct?

18 A (Witness Weeks) Through the EDI interface, yes,
19 for fully mechanized.

20 Q Okay, well, it was divided into parts A and B,
21 wasn't it? If you look on page V-A-12 and the following
22 page?

23 A (Witness Weeks) Right.

24 Q Is that correct, it was divided into parts A and
25 B?

1 A (Witness Weeks) Yes.

2 Q And part A was to test fully mechanized orders, is
3 that correct?

4 A (Witness Weeks) Yes.

5 Q And part B was to test partially mechanized
6 orders.

7 A (Witness Weeks) That's correct.

8 Q And four fully mechanized orders, the Georgia
9 Commission standard is 97 percent received within one hour;
10 is that correct?

11 A (Witness Weeks) Yes, that's what the report
12 indicates.

13 Q And for partially mechanized orders, the standard
14 is 85 percent received within 24 hours, is that correct?

15 A (Witness Weeks) 85 in 24, yes.

16 Q Now this is one of the tests -- the test for order
17 errors on fully mechanized orders that was not satisfied, is
18 that correct?

19 A (Witness Weeks) It has a final result "not
20 satisfied."

21 Q Okay. But the partially mechanized orders were
22 satisfied, is that correct?

23 A (Witness Weeks) It shows a final result of
24 "satisfied."

25 Q Now looking at -- when you did this test, did you

1 test a certain number of orders that were intended to be
2 fully mechanized and a certain number of orders that you
3 thought would be partially mechanized?

4 A (Witness Weeks) The answer, I think, to your
5 question, if I understood it, is that for the orders
6 themselves there were specific designations of partially and
7 fully mechanized. For the errors, which is what 1-3-2
8 refers to, there were not the same provisioning of test bed
9 and specificity with respect to the exact ones -- exactly
10 which errors were supposed to be partially mechanized and
11 which ones were supposed to be fully mechanized. And this
12 represents more characterization of the errors we received
13 during our transaction testing than a design test for errors
14 that paid a great deal of attention to partially versus
15 fully mechanized.

16 Q All right, let me see if I understand that. You
17 didn't -- for this test you didn't designate partially
18 mechanized and fully mechanized. You let the orders go
19 through the system. And depending on whether or not they
20 flowed through the electronic systems, you designated them
21 as fully mechanized or partially mechanized; is that
22 correct?

23 A (Witness Weeks) For the initial test that would
24 be true.

25 Q Okay. And those -- the results of that initial

1 test are reported in Tables 1.5 -- V-1.5, and -- Parts 1,
2 2, and 3? Is that correct?

3 A (Witness Weeks) You're looking at the amended
4 pages that we handed out?

5 Q No, I am not, but I can hand the amended pages to
6 the Commission. Although -- let me ask a question. Maybe
7 we can shortcut that. The amended pages for this table
8 simply added directory listings; is that correct?

9 A (Witness Weeks) No, there were some additional
10 changes.

11 Q Okay. I don't think these will be relevant to the
12 questions I'm asking, but so your record can be clear, I
13 want to go ahead and hand out the amended pages. So the
14 record is clear, the pages I just handed out are revisions
15 that you made to this report that you delivered to the
16 Commission yesterday; is that correct?

17 A (Witness Weeks) Yes.

18 Q All right, as I said, I don't believe that these
19 questions are going to be impacted by this, by these revised
20 pages. When I look at Table 1.5, Part 1 for the initial
21 test -- strike that.

22 Let me go back. Before we get there, let's go
23 back to the summary test on page V-A-12.

24 A (Witness Weeks) Yes.

25 Q And when you made this determination of fully

1 mechanized and partially mechanized, there were a certain
2 number of orders that you couldn't classify as either fully
3 mechanized or partially mechanized; is that correct?

4 A (Witness Weeks) That's correct. Yes, during the
5 initial test, that's correct.

6 Q Okay. So turning to Table 1.5, which is on Page
7 V-A-32 -- begins on Page V-A-32, when you reported those
8 results, you didn't include the orders that you couldn't
9 classify as either fully mechanized or partially mechanized;
10 is that correct?

11 A (Witness Weeks) That's correct.

12 Q And -- and if you need to check the report, please
13 feel do (sic), but will you agree with me that Footnote 24
14 says that response is to seven -- well, strike that. It's
15 unimportant. We won't waste the Commission's time.

16 When you did the retest, similarly there were --
17 you depended on actual fallout to determine whether an order
18 was partially mechanized or fully mechanized; is that
19 correct?

20 A (Witness Weeks) That's correct.

21 Q And the retest results are reported in Table V-
22 1.6; is that correct?

23 A (Witness Weeks) That's correct.

24 Q Now, are the errors, that you could not classify,
25 reported in this table? This is the retest.

1 (Brief pause.)

2 COMMISSIONER BURGESS: We need to have an answer.

3 WITNESS FREY: Trying to make sure we get the
4 right answer.

5 COMMISSIONER BURGESS: I want the right answer,
6 but if we're going to have a conference that's going to last
7 much longer, we're going to have to reconsider how we're
8 going to proceed. I want you to have the opportunity to
9 consult with Mr. Weeks, but we've got to be a little bit
10 more timely in our responses.

11 WITNESS FREY: Sure.

12 A (Witness Weeks) We believe we have -- were
13 successful at classifying all of the orders in the first
14 retest, and that the footnote that says something to the
15 contrary should have been removed from the report.

16 Q So this change in the footnote, on Footnote 24 on
17 page V-A-12, which states that of 30 non-classified orders,
18 70 percent were received within 24 hours, that sentence
19 should be removed? There were no unclassified orders?

20 A (Witness Weeks) That's our testimony.

21 Q Is that in the changes that we delivered in the
22 Commission yesterday?

23 A (Witness Weeks) No, it is not.

24 Q Are there other changes...

25 A (Witness Frey) The table has been updated with

1 the appropriate data. The footnote was not deleted in the
2 changes delivered to the Commission and parties of record
3 yesterday.

4 Q So the numbers are reported in table IV-1.5?

5 A (Witness Weeks) You can rely on the table, and
6 the footnote you...

7 Q But the footnote is inaccurate?

8 A (Witness Weeks) That's correct.

9 COMMISSIONER DURDEN: May I interrupt here. I
10 have a question that's probably unrelated to anything that
11 we're talking about right now. But in the report that I was
12 handed, Table IV-1.4, "Average Pre-Order Response Timeliness
13 by Category," Page IV-A-21, appears to be identical to Page
14 4, A-22. Is that -- is there supposed to be some
15 difference, or is that just an inadvertent inclusion? If
16 there was a difference, I'd like for you to point it out.

17 WITNESS FREY: I'm sorry, Commissioner, what...

18 COMMISSIONER DURDEN: Page IV-A-21 and Page IV-A-
19 22 appear to me to be the same table. They appear
20 identical. Are they?

21 WITNESS WEEKS: We're looking. Hold on a second.

22 COMMISSIONER DURDEN: Okay.

23 WITNESS FREY: Sir, are you referring to documents
24 that AT&T has handed out, or are you referring to...

25 COMMISSIONER DURDEN: I'm referring to the

1 document that this lady right here, this woman, this
2 attorney handed me.

3 WITNESS FREY: Yeah. And we're -- I guess the
4 question as to AT&T, were those taken from the final report
5 issued on March 20th, 2001?

6 MS. AZORSKY: They were.

7 WITNESS FREY: Okay. On Page IV-A-22.

8 WITNESS WEEKS: IV-A-22, in our copy of the
9 report, shows table IV-1.4.

10 COMMISSIONER DURDEN: Yeah. So does mine.

11 WITNESS WEEKS: And the next page...

12 COMMISSIONER DURDEN: No. No. IV-A-21 and IV-A-
13 22.

14 WITNESS WEEKS: Yes. IV-A-21 doesn't have a table
15 on it in our copy of the report.

16 COMMISSIONER DURDEN: Well, it does on mine.

17 MS. AZORSKY: And I think -- I think what
18 happened, Mr. Commissioner, is there is an electronic copy
19 of the report posted on the Commission's website, and the
20 page numbers are slightly different. So that on the
21 electronic copy the table ends on IV-A-20, and the table
22 appears on IV-A-21, and the copies were made from two
23 different versions, so they are -- they do appear to be
24 identical.

25 COMMISSIONER DURDEN: Well, they are identical on

1 this.

2 MS. AZORSKY: They are because they're from two
3 different copies. But that's because the electronic version
4 of the report has different page numbers.

5 COMMISSIONER DURDEN: Okay. And I have a
6 question, too, about that table. Why is the average
7 response time for all of these categories in initial testing
8 so vastly different from the average response time in the
9 retest?

10 WITNESS WEEKS: BellSouth made certain system
11 changes to accomplish that.

12 COMMISSIONER DURDEN: Do you believe that -- in
13 other words, my concern is if they went from 63.3 seconds to
14 1.9 seconds, that they could go back the other way?

15 WITNESS WEEKS: I couldn't comment on that. I
16 mean, anytime one makes system changes, you can see a
17 potential impact on performance. So I would have to say
18 yes, that's within the realm of possibility that that could
19 happen if a system change was made.

20 COMMISSIONER DURDEN: Okay. I'm sorry to digress,
21 but that...

22 MS. AZORSKY: Perfectly all right, Mr.
23 Commissioner. It's your hearing.

24 BY MS. AZORSKY:

25 Q On the final retest for this error clarification

1 timeliness, the second retest, which is reported in Table
2 1.7...

3 A (Witness Weeks) Okay, we're on 1.7.

4 Q Wait. Actually let me back up. I'm sorry. I
5 want you to look at Table 1.6. B-1.6 on your corrected
6 pages.

7 A (Witness Weeks) Okay, we're on 1.6.

8 Q Has this summary table been modified?

9 (Brief pause.)

10 Q The revised copies that we just handed to you.
11 There's only two of them.

12 A (Witness Frey) There's no corrected copy of Table
13 1.6.

14 Q Okay. So Table 1.6 on V-A-35, has not been
15 modified?

16 A (Witness Weeks) That's correct.

17 A (Witness Frey) That's correct.

18 Q All right. When you came to your conclusion that
19 BellSouth met the benchmark for partially mechanized errors,
20 did you rely on the disaggregated data in the table, or did
21 you rely on the summary data?

22 A (Witness Weeks) Summary.

23 Q So even -- so even though you've reported the 30
24 orders that you originally couldn't classify in your
25 disaggregation table, you did not rely on those in

1 calculating BellSouth's compliance with the 85 percent
2 benchmark established by the Commission; is that correct?

3 A (Witness Weeks) The -- the results in our report
4 are based upon the aggregated information that's in the
5 summary table.

6 Q Okay. So did you go back and reevaluate your
7 conclusion that BellSouth had met the partially mechanized
8 standard when you were able to classify the 30 orders that
9 previously you could not classify?

10 A (Witness Frey) I think the -- your previous
11 question might have been misunderstood. The data that has
12 been classified and treated appropriately in the tables does
13 form part of the results on which our analysis was based.
14 And those classifications are included in both the summary
15 tables and in the disaggregated tables.

16 Q So you have now included these 30 orders that were
17 previously unclassified in the summary table?

18 A (Witness Frey) Those orders have always been
19 included in the summary tables.

20 A (Witness Weeks) For the -- for the first retest.

21 Q For the first retest?

22 A (Witness Weeks) Yes.

23 A (Witness Frey) Yes.

24 Q And so you're -- where did you put them? Did you
25 put them in fully mechanized or did you put them in

1 partially mechanized?

2 A (Witness Weeks) Where they belonged. Either one.
3 Whichever was appropriate for the each of the 30 orders.

4 Q When you originally reported them, you could not
5 classify the 30 orders; is that correct?

6 A (Witness Weeks) As we've said, the footnote is
7 incorrect. By the time we got to producing these tables,
8 both the summary table and the disaggregated tables, they
9 had been classified and placed in their proper position in
10 the appropriate columns and rows in the tables.

11 Q So, for the retest on error clarification
12 timeliness for partially mechanized orders, the total number
13 you tested was 70, not 100?

14 A (Witness Weeks) For partially, that would be
15 true. Yes, that's true for partially.

16 Q And those are accurately reflected?

17 A (Witness Weeks) We believe they are.

18 A (Witness Frey) When you say the total we tested,
19 the error clarifications received in response to orders
20 submitted totaled 70 for partially mechanized -- for orders
21 that were classified as partially mechanized. Yes, that's
22 correct.

23 Q And now, previously all of those orders were not
24 reflected in the disaggregated data?

25 A (Witness Weeks) In the final report that you're

1 looking at, the -- both the aggregate and the disaggregated
2 tables contain the 30.

3 Q With the corrected pages?

4 A (Witness Weeks) Right. Well, they had them in
5 the originals.

6 A (Witness Frey) These aren't corrected pages.
7 Right.

8 A (Witness Weeks) We didn't correct these pages.
9 We did not correct these pages as a result of the 30, let's
10 put it that way.

11 Q Okay. So Footnote 24 has always been incorrect?

12 A (Witness Weeks) That is correct.

13 Q Thank you.

14 All right, let me focus on a different -- let me
15 focus on a different issue with regard to Tables 1.6, Part 1
16 and 2. When you reached your conclusions, and I believe you
17 said this just a moment ago, in calculating whether the
18 response time for fully mechanized and partially mechanized
19 errors met the Commission's standard, you calculated that
20 based on Table 1.6, Part 1, the summary data; is that
21 correct?

22 A (Witness Weeks) I believe that's correct.

23 Q Okay. Now, you reported it based on the
24 disaggregated data that is included in the Commission's June
25 6th order, applying standards and benchmarks for this third-

1 party test; is that correct?

2 A (Witness Weeks) Yes.

3 Q But your evaluation was not based on that?

4 A (Witness Weeks) That's correct.

5 Q Okay. Is there a reason that you based your
6 evaluation on the aggregated data instead of the
7 disaggregated data ordered by the Commission?

8 A (Witness Frey) At the time of the test, when the
9 order sample sizes were designed, the standards to be used
10 for purposes of the test had not been specified by the
11 Commission. These levels of disaggregation were not known
12 to us. These tables were provided for information purposes
13 only.

14 Q When did you conduct the retest? You might want
15 to look at page V-A-37, the notes to the table on the
16 retest.

17 A (Witness Frey) We conducted August 25th through
18 November 15th, 2000.

19 Q Could you have tested for the retest based on
20 statistically valid samples for the level of disaggregation
21 ordered by the Commission?

22 A (Witness Frey) Theoretically, yes.

23 Q Okay. And when did you conduct the second retest?

24 A (Witness Frey) January 19th through February 27th.

25 Q So those tests also were conducted after the

1 Commission issued its order establishing benchmarks and
2 standards for this test; correct?

3 A (Witness Frey) That's correct. And retests were
4 targeted based on criteria that had been identified in the
5 first and second -- in the case of the second test, criteria
6 that were identified in the first test as not satisfied; in
7 the case of the second retest, for criteria that, in both
8 the initial test -- or in the initial test and/or the
9 retest, had not achieved a satisfied -- had not achieved
10 satisfactory performance.

11 Q So when you conducted the initial retest, the test
12 that was conducted after the Commission's orders on
13 standards and benchmarks, you didn't test any local number
14 portability, or you tested one local number portability
15 standalone; is that correct?

16 A (Witness Weeks) For partially mechanized?

17 Q Put them both together; fully mechanized and
18 partially mechanized. If you look at Table 1.6, Part 2 --

19 A (Witness Weeks) Right.

20 Q -- on the disaggregated data, and we look at the
21 line that says, "LNP Standalone," I see zeros all the way
22 across.

23 A (Witness Weeks) I do as well.

24 Q And if we look at partially mechanized, I see one.

25 A (Witness Weeks) That's correct.

1 Q Okay. Similarly, two wire loops with INP design,
2 when you did your first retest, I see zeros all the way
3 across on fully mechanized.

4 A (Witness Frey) INP had been phased out at that
5 time.

6 Q Okay.

7 COMMISSIONER BURGESS: That's interim number
8 portability?

9 WITNESS FREY: That's correct.

10 BY MS. AZORSKY:

11 Q Okay, when you did your retest, you tested four 2-
12 wire loops; is that correct?

13 A (Witness Frey) Are you talking about the first
14 retest or the second retest?

15 Q Second retest.

16 A (Witness Frey) There were four 2-wire loop
17 design; that is correct.

18 Q Okay. If -- again, for the second retest, would
19 it have been possible to set statistically valid samples for
20 all of the levels of disaggregation in the Commission's
21 order, in order to conduct the -- when you conducted those
22 tests?

23 A (Witness Weeks) We're being advised by our
24 statistician that statistically valid sample size is not a
25 term that statisticians would be comfortable using. The

1 design of sample sizes is somewhat complex and can't be
2 oversimplified easily. We certainly -- if you're asking the
3 question could we have tested more instances than we did,
4 the answer is yes, we could have. The design of the retest,
5 as previously testified, was not to recreate the entire test
6 over again, it was to focus in on particular issues that
7 were raised in exceptions. So you see a mix of transactions
8 that reflects the design of the test as we -- the design of
9 the retest as we were focused on clearing exceptions.

10 COMMISSIONER DURDEN: Let me ask you this
11 question. Isn't it true that the size of the sample -- as
12 the size of the sample gets larger, a statistically
13 significant result is easier and easier to achieve in the
14 sense that a given difference will tend to be statistically
15 significant -- more likely to be statistically significant
16 in a larger -- a much larger sample size than it will in a
17 much smaller sample size?

18 WITNESS WEEKS: If there really is a difference,
19 then the test would be designed in such a way that if there
20 really were a difference, the answer is yes, the larger the
21 sample size, the more likely that you would get that.

22 COMMISSIONER DURDEN: Yeah. Although I think -- I
23 mean, I'm not disagreeing with you that you can't -- it's
24 not meaningful to say, "We've got a statistically
25 significant sample size." That's a very different thing

1 from what -- from what we just talked about.

2 WITNESS WEEKS: That's correct.

3 COMMISSIONER DURDEN: But I think we don't want to
4 be misled by assuming that because something is
5 statistically significant, we don't want to overdo that.

6 WITNESS WEEKS: Correct.

7 COMMISSIONER DURDEN: I'm not saying you can --
8 you can't generally manipulate it to get whatever outcome
9 you want, although you can massage data. I think that's
10 kind of a common misconception. But there are some things
11 built into the way these things are calculated that can
12 yield a result that can be -- can be, I'm not saying any of
13 these are -- but can be misleading in the sense -- and this
14 is one good example. If you've got a sample size of 2,000,
15 a given difference is more likely to be significant than if
16 you have a sample size of 100, all other things -- all other
17 things being equal.

18 WITNESS WEEKS: If there's a true difference in
19 the population, yes.

20 COMMISSIONER DURDEN: Yeah. Well, without a true
21 difference, you don't have any difference.

22 WITNESS WEEKS: Yes. As has been pointed out, you
23 could still observe in your sample differences where...

24 COMMISSIONER DURDEN: That could be attributed to
25 randomness.

1 WITNESS WEEKS: ...to randomness; exactly.

2 COMMISSIONER DURDEN: Yeah. But that's what the
3 test of significance is designed to ferret out; right?

4 WITNESS WEEKS: That's correct.

5 COMMISSIONER DURDEN: And the other point I want
6 to make is choosing the level of significance, whether it's
7 .05 or .01, can also have a big effect on whether a given
8 difference is statistically significant or not. And that's
9 one of the things that statisticians have to mull about
10 before they even begin, is at what level of significance do
11 we want to test; right?

12 WITNESS WEEKS: The answer is yes.

13 COMMISSIONER DURDEN: The answer is yes. And what
14 that means is, if you choose a .05 level, that means that
15 with regard to this particular sample, if there is less
16 than -- if there's a five percent or less chance that this
17 was just a randomly generated difference, then it's going to
18 show up as statistically significant; correct? Yes.

19 WITNESS WEEKS: That's correct.

20 COMMISSIONER DURDEN: And if its -- if your level
21 of significance is .01, that means you've decided that it's
22 more important -- one of the considerations, it's more
23 important to make sure that you've got a statistically
24 significant -- I believe I'm saying this right --
25 statistically significant sample in fact. Because that

1 means there's less than a one percent chance that the
2 difference was just due to pure randomness. One percent or
3 less.

4 WITNESS WEEKS: That's correct.

5 COMMISSIONER DURDEN: Okay.

6 MS. AZORSKY: I'm impressed. But let me follow...

7 COMMISSIONER DURDEN: What I'm impressed with is
8 that they have to consult before they answer these
9 questions. I don't know what to make of that.

10 MS. AZORSKY: That's a good question. But I'll
11 let you ask that question.

12 COMMISSIONER DURDEN: I will ask it.

13 BY MS. AZORSKY:

14 Q Following up on Commissioner Durden's question,
15 and looking at Table 1.6, Part 2, which lists the levels of
16 disaggregation ordered by the Commission, did you conduct
17 any analysis to set sample sizes that you felt -- I won't
18 use the term "statistically valid" -- that would be
19 meaningful for each of these individual levels of
20 disaggregation?

21 A (Witness Frey) No, our -- our test was not
22 constructed with the levels of disaggregation specified in
23 the June 6th order.

24 Q Thank you. I have no further questions.

25 COMMISSIONER BURGESS: BellSouth?

1 MR. ROSS: We respectfully request that we be
2 permitted to go after the other parties in this docket, if
3 we could.

4 MS. BOONE: Chairman Burgess, we would object to
5 that. I believe it's traditional that friendly cross-
6 examination be the first cross that's offered. That's how
7 it happens in all the other dockets that we participate in
8 here. And I believe BellSouth is sponsoring the test,
9 ultimately.

10 COMMISSIONER BURGESS: I said that when we started
11 the -- we would go in alphabetical order, and I didn't hear
12 any objection from any party at that time, so we're going to
13 go that way. So, Mr. Ross, it's time for BellSouth to come
14 on.

15 COMMISSIONER DURDEN: See, if you'd kept the name
16 Southern Bell, that would have solved your problem.

17 (Laughter.)

18 MR. ROSS: I just have a few questions just to
19 clarify some of the issues that were raised by counsel for
20 AT&T.

21 FURTHER CROSS EXAMINATION

22 BY MR. ROSS:

23 Q Mr. Weeks, I'd like to direct your attention to
24 pre -- 1-3-3 which was in the pre-ordering section of the
25 test, the test criteria -- I'm sorry 1-3-3. Do you have

1 that?

2 A (Witness Weeks) Yes.

3 Q And this was the issue of one second response for
4 the CLECs and the .05 second response for BellSouth, do you
5 recall those questions?

6 A (Witness Weeks) Yes, I do.

7 Q What is the actual test criterion that's being
8 evaluated here?

9 A (Witness Weeks) As stated in the report, it says
10 that the TAG interface provides timely pre-order responses
11 from the -- in this case DSAP back end system.

12 Q Does KPMG have an opinion as to whether .05 or one
13 second is a timely response?

14 A (Witness Weeks) We would think that both of those
15 would be considered timely responses.

16 Q Now you had testified in response to questions
17 from counsel from AT&T that the standard at the time that
18 the Commission had adopted was a parity standard; is that
19 correct?

20 A (Witness Weeks) Yes, that's our understanding,
21 that it was parity with retail.

22 Q To your knowledge, do you know whether the
23 Commission has since modified that standard?

24 A (Witness Weeks) We have no knowledge of whether
25 that's taken place or not.

1 Q Let me ask you to assume for purpose of my
2 question that the Commission has since modified the standard
3 to be a parity plus two second interval. Assuming that that
4 standard were applied here, would this criterion be
5 satisfied?

6 A (Witness Weeks) Yes, it would be satisfied.

7 Q In the discussion that you had with Commissioner
8 Durden and counsel for AT&T about statistical tests, were
9 the statistical tests that you employed here in connection
10 with the test of BellSouth's OSS consistent with the
11 statistical tests employed by KPMG in other states?

12 A (Witness Weeks) It's consistent with current
13 practices. There may be practices in New York that it's not
14 consistent with.

15 Q Commissioner Durden also asked you a question
16 about Table IV-A-4, which dealt with the dramatic --
17 relatively dramatic improvement in BellSouth's performance
18 from the first test to the second test.

19 A (Witness Weeks) I remember the question.

20 Q I'm sorry IV-1-4, right. To the extent the
21 Commission were requiring BellSouth to report its
22 performance data for these particular back end systems,
23 would the Commission be able to monitor whether BellSouth's
24 performance had deteriorated or not?

25 A (Witness Weeks) To the extent that the breakdown,

1 the disaggregation in the SQMs recorded those results and
2 continued to do that, then they could monitor that, yes.

3 MR. ROSS: No further questions, Mr. Chairman.

4 COMMISSIONER BURGESS: Thank you. Cable
5 Television Association of Georgia.

6 MR. MIDDLETON: No questions.

7 COMMISSIONER BURGESS: Covad, Ms. Boone.

8 MS. BOONE: It's not as bad as it looks,
9 Commissioner.

10 FURTHER CROSS EXAMINATION

11 BY MS. BOONE:

12 Q Good afternoon, I'm Cathy Boone with Covad
13 Communications. How are you?

14 A (Witness Weeks) Good afternoon.

15 Q I'm going to be focusing mostly on the
16 supplemental test plan, which involves xDSL testing, and you
17 all have a copy of that there?

18 A (Witness Weeks) Yes, we do.

19 Q Do you also have a copy of the exceptions that you
20 filed?

21 A (Witness Weeks) Yes, we do.

22 Q Now the first thing I just want to be clear on is
23 exactly what you viewed KPMG's role as in this procedure.
24 Would it be fair to say that you inquired from BellSouth
25 what the process was for provisioning xDSL loops and then